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# COMMUNITY INVOLVEMENT PLAN

For the  
**STREAMSIDE TAILINGS  
OPERABLE UNIT**  
of the Silver Bow Creek Superfund site

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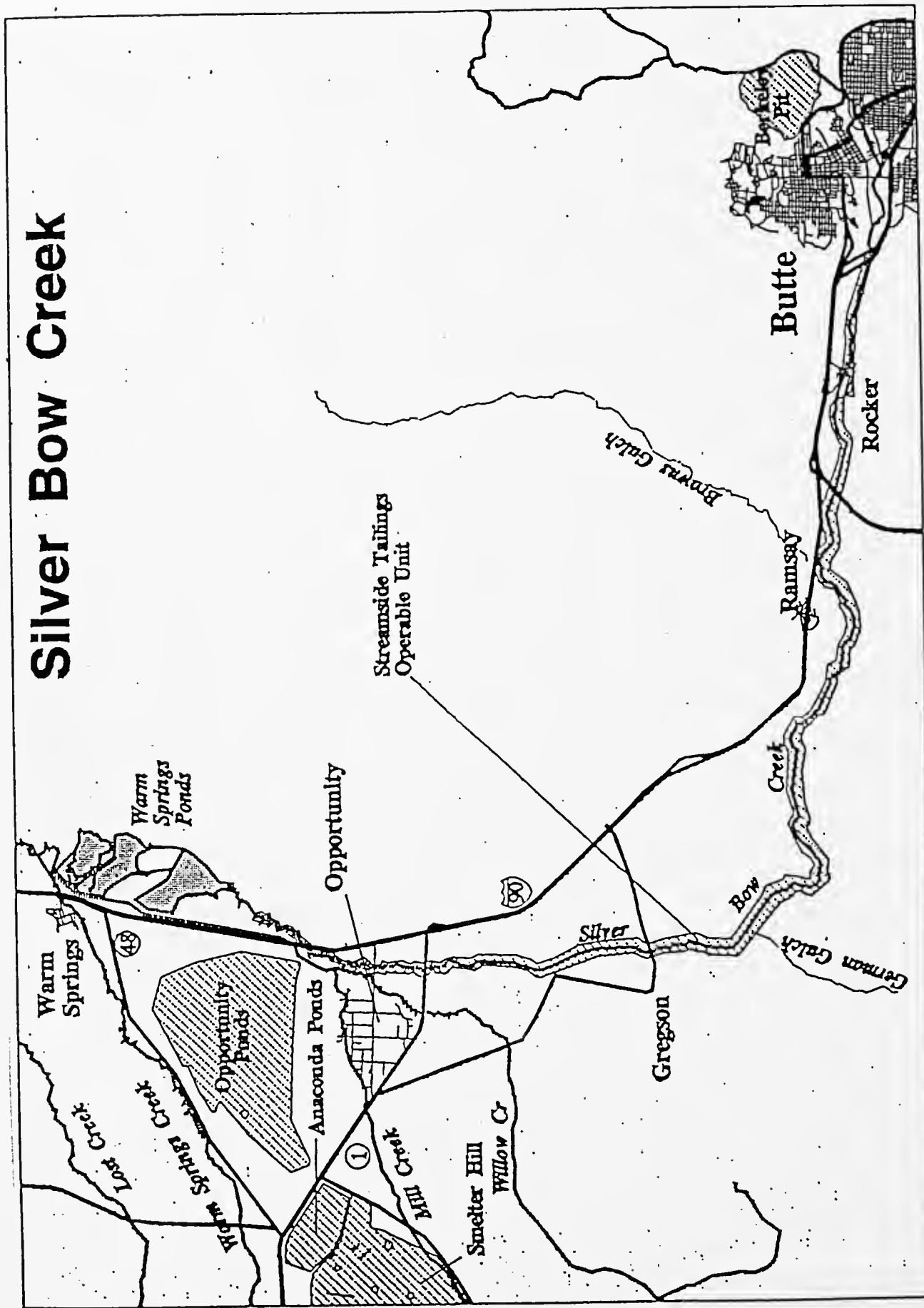
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By  
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# Silver Bow Creek



## INTRODUCTION

This community relations plan summarizes community concerns and outlines community relations activities to be conducted during the Superfund process through the Record of Decision for the Streamside Tailings portion of the Silver Bow Creek/Butte Area Superfund site in southwestern Montana. The Montana Department of Health and Environmental Sciences (MDHES) has primary responsibility for managing the remedial investigation/feasibility study, community involvement activities and other site-related activities. MDHES is funded through a cooperative agreement grant with the U.S. Environmental Protection Agency (EPA).

Atlantic Richfield Company (ARCO), a potentially responsible party for the operable unit, is conducting the remedial investigation and feasibility study with MDHES and EPA oversight.

This plan was prepared in accordance with guidance found in *Community Relations in Superfund: A Handbook*, Office of Emergency and Remedial Response, U.S. EPA, January 1992. The Handbook spells out the stipulations of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and as stipulated in the rules that interpret the Superfund legislation, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The EPA Superfund Community Relations Handbook states that "a community relations program should not try to quell controversy, but rather strive to anticipate, identify, and acknowledge areas of conflict so that decisions can be made with full understanding of community views." Because the Streamside Tailings remedial investigation has already begun, MDHES has relied on the site-wide Silver Bow Creek community relations plan as well as the Rocker, Montana Pole and Anaconda site community relations plans to guide activities. All of these other plans are closely related and interwoven with Streamside Tailings activities.

The purpose of the community relations plan as well as the entire community involvement program is to identify the concerns of people affected by the site, and to address those concerns. The MDHES Superfund Program staff is required to conduct community interviews and, based on these interviews, to prepare a community relations plan that includes a description of the site background, history of community involvement at the site (including major community concerns), community involvement activities, a schedule of activities, and a list of contact people.

### *Community interviews*

Citizen interviews form the foundation for developing information to be disseminated to the public, and for determining what actions are necessary to address public concerns. To develop this community relations plan, MDHES conducted interviews with 34 residents from Butte to Missoula from 1992 through 1994. Interviewees were asked questions from a list in the EPA Community Relations Handbook as well as questions about potential site remedies. A list of the questions appears in Attachment C of this plan. MDHES endeavored to interview a representative cross-section of people with various backgrounds, opinions, interests



and needs. The interviews were not intended as a scientific survey. This plan is based on those interviews with local and state government officials, site area residents, state employees, citizens groups and members of the media. The interviews were conducted by the MDHES Superfund public information officer and site project manager.

### *Flexibility of the plan*

This document only addresses concerns and issues up to the date at which it is published. However, the plan is intended to be flexible enough that MDHES will be able to identify and address new issues as they arise. The plan will be updated as needed.

### *Public perception*

It is important to emphasize that the community relations plan presents the opinions and concerns of residents and other interviewees and not those of MDHES, EPA, or the potentially responsible parties. The information derived from the interviews and summarized in the plan reflects interviewees' responses, regardless of their perspective or background. MDHES recognizes that personal feelings about the site and the Superfund program, regardless of their foundation, are an important part of community concerns which must be addressed.

Responding to public concerns is a vital function of MDHES at the site. The Superfund National Contingency Plan mandates response to all substantial comments made about the site feasibility study. Throughout the Superfund process, MDHES has and will continue to respond to all substantive questions and concerns.

Based on the interviews, community concern about Streamside Tailings is moderate to high depending on where the interviewees live. Those who are adjacent to the creek or are downstream voiced a higher level of concern than those who are upstream in Butte. A variety of agencies and individuals are interested in the site. MDHES considers the concerns of these various groups during the decision-making process.



## CAPSULE SITE DESCRIPTION

### *Current environmental situation*

The Silver Bow Creek/Butte Area Superfund site is a tract of land encompassing a large portion of Butte and the floodplain of Silver Bow Creek from the headwaters of Silver Bow Creek to the downstream end of the Warm Springs Ponds. The Streamside Tailings Operable Unit is one 25-mile long part of the site. It includes Silver Bow Creek and its adjacent floodplain and tailings deposits from Butte to the Warm Springs Ponds and railroad beds adjacent to the creek (please refer to map). Mining activities in the Butte and Anaconda area have contaminated the Clark Fork River basin with mining, milling and smelter wastes. In addition, activities at the Montana Pole and Treating Facility contributed organic (petroleum-based) contamination to the area and to Silver Bow Creek.

The Streamside Tailings area includes not only Silver Bow Creek itself, but also the adjacent mining wastes deposited along the creek banks and associated floodplains. Mine wastes, from milling and smelting facilities once located next to Silver Bow Creek, have been washed down the creek for more than 100 years. These wastes, known as tailings, are contaminated with arsenic and heavy metals including lead, copper, zinc, cadmium and mercury. In addition, railroad bed and ballast materials in the Silver Bow Creek area was often composed of mine waste rock or slag, and may be contaminated by heavy metals. Ore hauled between Butte and Anaconda may also have spilled from trains. Because the railroad beds lie close to Silver Bow Creek and can affect the creek and floodplain, MDHES also included them in the Streamside Tailings remedial investigation. Wastes from wood treating facilities, including arsenic, creosote and pentachlorophenol may also contaminate the water and sediments of Silver Bow Creek. These wastes most likely originated at the Montana Pole and Treating Plant in Butte and the Rocker Timber Framing Plant in Rocker and are addressed in studies of those sites.

An estimated three million cubic yards of tailings and contaminated soils are widely scattered along Silver Bow Creek and its floodplain, in many places killing all vegetation. The largest tailings area, 160 acres, lies near the town of Ramsay and is called Ramsay Flats. In some areas, the tailings are estimated to be more than five feet thick. Tailings have also been carried onto agricultural areas by Silver Bow Creek irrigation water. Affected agricultural areas, however, will be investigated under a separate study.

Many of the metals in the tailings are thought to be present at concentrations high enough to be toxic or harmful to plants, animals and people. The tailings are typically acidic, which allows the metals to dissolve readily, making them easily transported in water. Groundwater and surface water can be contaminated by metals as water moves through the tailings. In addition, during dry periods, highly soluble metal salts form on the surface of bare tailings as soil moisture evaporates. Summer thunderstorms quickly dissolve these metal salts and wash them into Silver Bow Creek. Bare, unvegetated tailings can also be readily washed into the stream by storm or snowmelt run-off. Metals pollution in Silver Bow Creek has degraded the stream quality to the extent that no fish are present and other aquatic species are limited. Bare, unvegetated tailings can also be blown by winds to residential or recreational





areas where people may inhale or ingest them with the potential to cause increased cancer or other health risks.

### ***Chronology of Superfund activities***

When Silver Bow Creek was placed on the National Priorities List of Superfund sites in December 1982, the site boundaries extended from a point west of Butte, downstream to Deer Lodge. In November 1985, the boundaries of the site were expended to include the Butte area in the Silver Bow Creek investigations. In early 1986, the site boundaries were expanded westward from Deer Lodge to the Milltown Reservoir. In 1991, the site was shortened to the Warm Springs Ponds; the Clark Fork River portion of the site was added to the Milltown Reservoir Superfund site. Investigation of the originally designated portion of the site began in 1983 when a cooperative agreement between the EPA and the State of Montana funded MDHES as the lead agency. In 1990, MDHES turned the lead for the site, with the exception of the Streamside Tailings Operable Unit, back to EPA.

In March 1991, MDHES requested ARCO conduct the remedial investigation and feasibility study for Streamside Tailings. MDHES and ARCO negotiated an administrative order and work plan to direct ARCO in conducting the remedial investigation and feasibility study for Streamside Tailings. MDHES issued the draft administrative consent order and draft work plan to the public for review and comment in July 1991. After a 30-day public comment period, the order, work plan and related documents were finalized in September and October 1991.

As of the printing of this document (October 3, 1994), the remedial investigation, risk assessment and feasibility study are nearly complete and a record of decision is expected in 1995.

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## COMMUNITY BACKGROUND

### *Community histories and profiles*

Following is a brief history of the communities in and adjacent to the Streamside Tailings portion of the Silver Bow Creek/Butte Area site:

#### BUTTE

From the early 1870s to the late 1970s, Butte was one of the world's most productive mining districts because of rich copper deposits under the city and surrounding area. The Butte Hill has been called "the richest hill on earth," and at one time the Berkeley Pit, at the edge of Butte, was the largest open pit mine in the world. In addition to the open pit mines, it is estimated that there are more than 3,500 miles of mining tunnels under the city.

From the late 1800s to the early 1900s, seventeen active smelters and more than 300 different mines operated in the area. After the Anaconda Smelter was constructed, all smelting took place in Anaconda. The builder of this smelter, the Anaconda Company, eventually emerged as the major employer in the area and a major mining company in the country.

Butte was a large town during the height of mining activity at the turn of the century with a population of approximately 90,000 at one point. Digging of the Berkeley Pit in the 1950s began in the section of town once known as Meaderville. The pit was in operation until 1982 when all mining was shut down.

Today Butte's population is approximately 30,000. Butte is the largest of the Streamside Tailings communities. One interviewee who grew up there said Butte is a stark community as are its weather, landscape and people. An interviewee said that years ago, people came to Butte from a worse place; they came with sadness in their hearts, so the hazards were acceptable by comparison. The people of Butte don't recognize there are towns where creeks run through that are healthy, the same interviewee added. Another Butte resident said people love living in Butte. There is lots to do and nearby recreation. Butte's primary employers include Montana Resources, Montana Tech and Montana Power.

#### ROCKER

Rocker is a small community located about five miles west of Butte. Rocker was settled primarily by Chinese immigrant miners who named the town after the "rocker" used in placer gold mining. The town subsequently grew around the large Bluebird silver mine and mill but died back when the mine shut down in 1893.

Rocker revived when the Butte, Anaconda and Pacific (BAP) Railroad between Butte and the Anaconda Smelter chose Rocker as its division point. The BAP Railroad took ore from Butte to Anaconda for smelting, but only a limited number of cars at a time could be taken down the steep Butte hills. These small groups of railroad cars were gathered in Rocker and made into longer trains which then went to Anaconda. The Northern Pacific (NP) Railroad passed through Rocker. Supplies for the mines were taken from the NP cars and loaded onto the BAP cars in Rocker.



and then taken to Butte. Likewise, timber hauled in on the NP stopped in Rocker for framing and preparation to go to the mines.

The Rocker Timber Framing Plant opened in the early 1900s when the Anaconda Minerals Company decided to consolidate their timber framing and treatment operations. During World War II, as many as 150 workers were employed at the plant. The Rocker plant operated until 1957 when it was torn down and abandoned.

Today, residents of Rocker live on both sides of Silver Bow Creek and the community has about 150 residents. Rocker's municipal water and waste treatment are managed by the Rocker Water District. Water is piped to Rocker (as it is to Butte) from the Big Hole River. The Rocker Water District has been active in the process and will most likely continue to be. Rocker residents primarily work in Butte.

### RAMSAY

Ramsay is located about 12 miles west of Butte along U.S. Interstate 90. Ramsay originated as a Northern Pacific station and its post office opened in 1916. The houses in Ramsay were built and originally owned by E.I. DuPont de Nemours and Company during World War I. Dupont operated a dynamite plant near town; the dynamite was used in copper mining in Butte. The dynamite plant operated only a short time and then shut down. Dupont sold the town in the late 1940s and today the homes are privately owned.

In 1950 a chemical plant owned by Victor Chemical to produce elemental phosphorus opened southeast of Ramsay. Stauffer Chemical purchased the plant in the early 1960s and sold it to Rhone-Poulenc in the late 1980s.

Today, few if any people currently living in Ramsay work at Rhone-Poulenc. Most people work in Butte or are retired. There are 34 homes in Ramsay with a population of about 87. Ramsay's school district covers a large rural area and its K-8 school has 168 children. Ramsay is an unincorporated town.

### OPPORTUNITY

The Anaconda Mining Company established the town of Opportunity early in this century to prove that smelting activities have no effect on local agriculture. The company sold 20-acre tracts to their employees. The area, which was originally wetlands, was drained and is still agriculturally oriented although many homes sit on parcels smaller than 20 acres. The early farms raised livestock as well as wheat, oats, barley and vegetables. Early residents came from a wide variety of ethnic backgrounds. The first school was built in 1915. Later, the school was annexed into the Anaconda School District, then closed in the 1980s as the number of elementary school-aged children in Opportunity decreased. The school's original name was "Beaver Dam School," a commentary on the many beaver dams in the area.

In 1914, a street car which used old railroad tracks connected Opportunity to Anaconda, seven miles away. Later, the street car service was extended to the school and then to the tailings ponds. A golf course was built in Opportunity in 1915 and is still in use today.

Today, Opportunity is home to approximately 800 people, most of whom work in Anaconda and Butte.



## CHRONOLOGY OF COMMUNITY INVOLVEMENT FOR STREAMSIDE TAILINGS

Many area residents and local officials have expressed a strong interest in Streamside Tailings Superfund activities. In August 1991 MDHES began to actively involve the public in activities concerning this operable unit and will continue to involve the public in site issues and activities.

### *Activities so far:*

Following is a brief summary of the community involvement activities MDHES has conducted since the remedial investigation workplan was released in 1991.

### PUBLIC COMMENT PERIOD

MDHES held a 30-day public comment period on the Administrative Consent Order and Draft Work Plan. The comment period was publicized with the use of display and legal ads in the Anaconda Leader, Montana Standard of Butte and the Missoulian newspapers. As required by state law, MDHES sent copies of the legal ad to all county governments in the Clark Fork Basin. MDHES sent news releases to all newspapers, radio and television stations in the Clark Fork Basin and to the Associated Press office in Helena. The comment period began July 24 and ended August 23, 1991.

### PROGRESS REPORTS

MDHES has issued two progress reports about Streamside Tailings. The first was issued in August 1991 and focused on the site status and upcoming remedial investigation activities. The second was issued in February 1993 and focused on two streamside demonstration projects. Copies of the report were sent to the 800-plus people on the MDHES site mailing list. In addition, approximately 300 progress reports were sent in larger mailings (10, 20 and 30) to community groups, local government offices, libraries and other locations for distribution to memberships or placement in pamphlet racks.

### WORKSHOPS FOR THE PUBLIC

MDHES held a series of workshops to discuss with the public the Draft Administrative Consent Order and Draft Work Plan. To accommodate the large area covered by Streamside Tailings, MDHES held the workshops in Anaconda, Missoula and Butte in August 1991. Each meeting began at 7 p.m. These workshops were publicized in the same manner as the public comment period.





## PUBLIC MEETINGS AND HEARINGS

- MDHES held a public hearing August 13, 1991, at the Ramsay School to summarize the work plan and administrative consent order and to receive formal oral and written public comments. This meeting was publicized in the same manner as the public comment period and workshops, and the meeting was transcribed by a court reporter.

- MDHES participated in a series of four public meetings held by Headwaters Resource Conservation and Development District during fall 1992 and winter/spring 1993. The purpose of the meetings was to start a dialogue among MDHES, ARCO and the public about possible remedies for the site. Headwaters RC&D handled meeting arrangements and publicity. The meetings were held in the Ramsay School.

- MDHES held a public meeting Wednesday, March 31, 1993, at 7 p.m. in Opportunity to discuss ARCO's Demonstration Project II to be conducted in spring 1993. The meeting was publicized the same way as the other MDHES activities listed above. The meeting was held at the Opportunity Community Hall.

## SITE TOURS

In August 1991, MDHES conducted two site tours: one for local members of the press and one for local landowners. MDHES gained valuable insight from the property owners about the background and history of the operable units. Since then, MDHES has held a number of site tours for various members of the public, the Grant-Kohrs Ranch staff (National Park Service) and the Clark Fork-Pend Orielle Coalition as well as the media.

## CITIZENS GROUP

MDHES has worked closely with the Citizens Technical Environmental Committee of Butte. CTEC is a group comprised of residents with various backgrounds and interests. The group meets monthly about the Silver Bow Creek/Butte Area and Montana Pole sites. MDHES has attended CTEC meetings to discuss the sites and answer questions.

## *Community's level of understanding about the site and its contaminants*

Most interviewees said their understanding of site issues was low and said the public needs a better understanding of the Superfund process. However, three interviewees said people understand as much about the process as they care to learn.

Interviewees did say that the community understands what the contamination is and why it's a Superfund site. One person said people realize there are no fish in Silver Bow Creek but they don't equate that fact with Superfund contamination. One interviewee pointed out that Superfund issues are difficult to put in lay terms. Most interviewees expressed some level of confusion about the difference between MDHES and EPA. Several interviewees said the great amount of technical language surrounding Superfund is a barrier to understanding.



One person said there are lots of rumors about the history of the site; there is speculation about how the tailings got there. MDHES should clarify this issue. One woman said the people in Butte don't "see" the site, that they are wearing blinders and ignoring it. She said when she was a girl, most people in the community did not understand why they had to be cautious of the creek. She was also told to stay away from the ore on the railroad tracks. "My father was a great lover of rivers yet this (Silver Bow Creek ) was one we did not stop at."

In Anaconda, a woman said people there perceive Silver Bow Creek to be Butte's problem except for the Colorado Tailings which is now Opportunity's problem. She said the Opportunity community is still very angry even though the actual tailings hauling was successful.

As far as the public understanding the severity of wastes at the site, an interviewee said MDHES should show the relationship between public health and environmental health, that the agency should show how the site affects personal safety because the average person doesn't perceive she or he is personally affected by the site.

Another person said one hears a lot of "I've lived with it all my life and I haven't been affected" from people who are native to the area, but that people who move here later in life are horrified by the wastes.

### *Issues of local interest*

Although Superfund is a big issue in the area, it's certainly not the only thing concerning the residents. The economy was mentioned often. There is concern that copper prices will drop and Montana Resources Inc. will shut down its Butte mining operations. Montana Power Company (MPC) and Rhone Poulenc (formerly Stouffer Chemical) are important to the community's economy. An interviewee said there is always talk that MPC will leave Butte and locals are concerned about Rhone Poulenc's stability.

Other issues of concern to Butte residents included: Butte Water Company, Berkeley Pit flooding, water quality issues, jobs, education, and state tax reform. Residents further downstream expressed concern about Montana State Prison, the impending closure of the Galen and Warm Springs State Hospital facilities. Ranchers in the Anaconda area were concerned about weeds, especially leafy spurge.

A Deer Lodge interviewee said Superfund is not a major issue in his town. The major issues there are the shutting down of Kominco mine, the State Prison, and Warm Springs and Galen state hospitals.

### *Site issues which may be confusing to the public*

Many interviewees said they are confused about the difference between MDHES and EPA. Risk assessment issues also cause some confusion, especially exposure routes and health effects. Additionally, people are still confused about the Superfund process.



### ***Environmental concern level***

There are different levels of concern among community members and among the various communities. According to the interviewees, environmental concern levels rise as one goes downstream from Butte to Missoula. Environmental consciousness is apparently rising compared to seven years ago when MDHES first raised this question to the community. People are becoming more aware of the environment; they say it makes a difference in the economy and in public pride. Some people see environmental cleanup as a growth industry translating to more jobs and a better local economy. One person said environmental concern stems primarily from use of the resource. Several interviewees said environmental concern appears to be greater downstream toward the Clark Fork River.

Several interviewees said environmental concern varies depending upon the resident's age. People over 50 tend to be less concerned about environmental issues and school children are the most concerned. Another interviewee said that environmental concern does not always equal environmental awareness or education.

Environmental regulation is another aspect of the issue: one man said the community created its own environmental problems and is now angry with government for regulating the community.

Most interviewees said the people of Butte see environment and economy as issues which must be balanced, but some see environmental issues and the economy as polar opposites. One woman said people have learned the value of natural resources because the historic economy was based on industry and mining, but people in Butte don't understand that everything is tied together including environment and economy. People in Butte are still willing to bring in polluters to keep or gain a good economy, she added.

Ramsay interviewees said their concern about the environment tends to be associated with agriculture and available resources -- primarily water for irrigation. Contamination of water and pasture land is a major concern.

In the rural area near Anaconda, people said their major environmental concern is Rhone-Poulenc's air emissions. They said they are glad to see beaver upstream in Silver Bow Creek. Environmental cleanup is creating a lot of jobs but it can also take away a lot of jobs and they believe Pegasus can't operate at full capacity because of environmental restrictions.

Anaconda people voiced a higher level of concern than that voiced by the Butte interviewees. An Opportunity woman said her community is concerned about the environment but wants the agencies to be most concerned about human health.

A Deer Lodge businessman said 80 percent of people there would like to see cleanup but it doesn't affect them personally. People have seen continuing improvement over the past 20 years. He wants to see it improve more.

Based on the interviews in Missoula, environmental concern appears higher there than in the other site communities. Interviewees there expressed concern that they are the downstream recipients of the problems at Streamside Tailings. They are concerned about the effects Streamside Tailings contamination may have on their groundwater and on the Clark Fork River.



*Economic concern level*

Opinion about economic issues appears to be changing. More people say economics and the environment are not separate issues. One interviewee said people hope site cleanup will create a job for them. A Deer Lodge businessman said "Main Street" business people in his community don't foresee a big boom for the economy if the Clark Fork is cleaned up. Although there may be more fishing, it won't make a big difference to the economy, they say.

A woman in Anaconda said overall, Anaconda is more concerned about money than the environment; environment always comes second to money. However, environmental issues are starting to come to the forefront.

*Attitudes toward involved agencies and potentially responsible parties*

Interviewees were asked their feelings about EPA, MDHES and the potentially responsible parties. MDHES prefaced this question by saying that MDHES would like to know both positive and negative feelings. Overall, answers tended to contain a central theme about the stake these agencies hold in Montana's future.

**1) EPA**

One interviewee said that although EPA in Helena employs lots of nice people, they probably won't be staying in Montana forever and therefore have less stake in the outcome of the site.

Comments from interviewees ranged from saying EPA had been extremely helpful to one person who expressed strongly negative feelings about EPA's administration. However, all interviewees said they liked the EPA Montana project staff. One person said EPA accepts ARCO's lead without full review of the consequences.

One person complained that EPA makes decisions and doesn't explain them. Another person said there is lots of red tape and delay associated with EPA. An interviewee described EPA as understaffed, under-funded and responsive to public criticism. One person said the agency is trying to do a good job but government caters to big business which weakens environmental laws.

**2) MDHES**

Few interviewees were able to draw a clear distinction between MDHES and EPA, but those who were able to do so said MDHES project staff had been helpful and dedicated and they were more inclined to believe MDHES than EPA.

Several people said MDHES should be more involved in Superfund because MDHES has more at stake. Another said he wants MDHES to do more community relations on EPA-lead sites and thinks MDHES and EPA should adopt a more integrated approach to community relations at the Clark Fork Basin sites.

A Deer Lodge man said he has great sympathy for state employees trying to do a good job under difficult conditions. He said politics are hurting us but we are doing a better job than we were seven years ago. He contends that the state's low budget doesn't give us a commanding role in Superfund.





### **3) ARCO, a potentially responsible party**

Most people expressed neutral to negative feelings, although a few people were more positive about ARCO. One woman was philosophical about ARCO; she said we are lucky the potentially responsible parties are financially viable. The majority expressed the opinion that the company is responsible and owes it to Montana to clean up the site and make Butte safer. A Butte woman said profits from the hill went out of state, causing resentment which is still alive. She said some people blame ARCO for local economic woes and the shutdown of mining.

One interviewee said ARCO (referring to its predecessor, AMC) ran the state with an "iron hand," they took all the timber near Anaconda for the smelter and polluted the land. He explained that people couldn't raise horses in the Anaconda area until 1940. Horses would live only five to six years if they were brought in as adults and horses born in the area lived only a couple of years. Currently, he feels ARCO inherited an awful mess they aren't responsible for making. It's too bad AMC didn't clean up the area as they mined it.

Another interviewee said recent ARCO television advertisements irritate him because they are spending a lot of money that isn't going toward cleanup. He said ARCO is in violation of water laws and as long as MDHES goes along with it, it will make the state look bad. ARCO is damming water they have no right to in the Warm Springs Ponds, he said.

A person said the local ARCO staff has a difficult job and everything is directed from out-of-state management.

An Anaconda resident said the company is cooperative but the Anaconda community doesn't trust them. This underlying mistrust concerns her.

One man said ARCO is always talking about wildlife habitat which usually gets them out of real cleanup. He said he hasn't seen any real improvement of habitat for fish and wildlife but at least ARCO made an attempt in the Mill-Willow Bypass.

Most interviewees said they are skeptical about what ARCO says because they understandably have an "interest to protect." Another person said ARCO's public outreach program is politically motivated and that the company is trying to change Superfund law to get out of liability. When ARCO speaks at a public meeting, the agenda and discussion become suspect, one person said. Some interviewees said ARCO has little at stake in Montana and wants to get out of Montana as quickly and cheaply as possible. One interviewee pointed out that, nationally, ARCO isn't in the remediation business.

In some of the small communities there are more specific feelings about ARCO. Some people said ARCO's credibility during presentations at public meetings is poor, especially in Ricker because of what happened during the discovery and subsequent removal of high-arsenic wood chip piles; there were too many delays with no explanation from ARCO. An Opportunity resident said ARCO is picking on that community by taking the Colorado Tailings there.

One interviewee countered most of the sentiment and said ARCO has moved some dirt. As with feelings about EPA and MDHES, several people said they like ARCO's Montana project staff but distrust the company and its administrators. Some people think ARCO is a good neighbor. A member of the media said Sandy Stash is a great spokesperson because she is accessible and provides the information needed.



## KEY COMMUNITY CONCERNS ABOUT THE SITE

Several people said the level of concern about the site depends on where you live in relation to the site and that interest in the site depends on whether the citizen is monetarily affected. Concerns expressed dealt almost entirely with site cleanup; only a few concerns about the Superfund program and process were voiced.

Following is a list of the concerns expressed during the interviews:

### *1) Effects of site contamination on public health*

An interviewee said the health of people is tied to the health of their environment. The family was concerned about inhalation of contaminants. They said blowing dust burns when it sticks to the skin and they notice it even makes their dogs cough. They also said they can still smell the sulfur in Silver Bow Creek. A resident near Ramsay said there is a huge amount of dust which blows from Ramsay Flats. It not only reaches his home but also Rocker and Butte. One resident said his son and his son's friend became very ill walking in Silver Bow Creek.

Another interviewee was concerned about cancer rates in the Upper Clark Fork Basin and said he believes they are among the highest in the U.S. He said there is not enough information about health effects and residents haven't been warned enough. The contaminants should be of great concern to the public, he said. He strongly urged MDHES to conduct epidemiological studies. He said the state hasn't been helpful on this; they have refused to do epidemiological studies and risk analysis doesn't replace it. People don't make the link between contamination and public health and environmental effects, he said.

### *2) Effects of site conditions on the environment*

The health of Silver Bow Creek is of concern because of effects on Clark Fork fisheries and downstream drinking water quality. Eutrophication (resulting in the loss of oxygen) of Silver Bow Creek was another environmental concern but one which is probably not related to contamination from the Streamside Tailings site. An Anaconda area family said they are concerned about the effects of more new septic systems on the quality of the creek.

Water quality issues should have the highest priority because of people's health, one interviewee said. Erosion into Silver Bow Creek has to be stopped with willows or some vegetation, another person said, because currently every little disturbance creates a mess. Getting a cleanup that's effective and creates good water quality for an affordable price is important.

Potential adverse effects on wildlife were also mentioned, specifically effects on beaver, muskrat, ducks, and deer. People mentioned direct poisoning of wildlife in addition to uptake of metals via plants.

Several people said they are concerned about the safety and quality of groundwater. One man near Ramsay said if his well becomes contaminated then his property is worth nothing. Another person was concerned about the influence of



contaminated groundwater from the Berkeley Pit and whether contaminated groundwater is returning contamination to Silver Bow Creek.

***3) Coordination of Streamside Tailings site activities with other Superfund sites and the Natural Resources Damages Assessment program lawsuit***

Several interviewees said they want activities at the site closely coordinated with the other Clark Fork sites operable units even if it takes longer. Two interviewees said they want the Superfund work to closely mesh with the Natural Resources Damage Assessment lawsuit being undertaken by the state. They said that because restoration of the resource is the goal of the Natural Resource Damage Assessment program, it should also be the goal of Superfund. They reasoned that it only makes sense for Superfund to leave off where Natural Resource Damage Assessment will begin.

Restoration and permanence should be considered together, one person said. MDHES should restore natural resources as the final cleanup alternative because ARCO's going to have to pay for restoration anyway. She wants to see the Natural Resource Damage Assessment suit integrated into Superfund. For example: revegetation of streamside tailings isn't real restoration of the original resource she said. MDHES should determine if the selected remedy will be compatible with Natural Resource Damage Assessment restoration.

One person said MDHES should use more positive language such as "restoration" when talking about cleanup. Public perception of fixing and restoring may be the same thing. The cost difference between the two is important, he said.

***4) Length of the Superfund process***

Only a couple of people interviewed expressed concern about this issue. An interviewee explained that protracted activities cause the community to adopt a jaded view and make it tough for the agency to keep concern and interest up. He added that individual issues become lost in the big picture -- issues become popular then die down. Consequently the public presumes nothing is happening. He said there may not be a way for MDHES to remedy this.

***5) The effects of the site on the local economy***

Socioeconomic impacts to the community were mentioned by a number of interviewees. A Missoula man said an improved environment equals an improved economy. One person explained that even though the community's economy isn't usually a Superfund consideration in cleanup decisions, one of the nine criteria is the money spent on cleanup, presumably by the potentially responsible parties. This is extremely frustrating to the community and makes them feel unimportant and that the impacts on them aren't considered while the impacts on the potentially responsible parties are. A woman in Anaconda said her community is especially concerned about economic effects because there is less land there; they worry about how Superfund will affect their business.



Total tailings removal would create jobs for heavy equipment operators who lost their jobs when ARCO closed. If tailings aren't totally removed, there will be loss of land use which will lead to loss of economy, a person said. Permanent cleanup and restoration equals long-term economic recovery because it will increase livability and attractiveness, an interviewee said.

#### *6) Meaningful public involvement of those people potentially most affected*

One woman in Butte said she is deeply concerned that people living along Silver Bow Creek downstream from Butte, who are potentially most affected by the site, have a strong voice in cleanup decisions. This would include all property owners down to the Milltown dam and beyond, possibly even to the Noxon Dam. She urged MDHES to make extra efforts to involve these people in decision-making.

Another person said landowners should have input about what happens on their property and that some people who have land along the creek don't want anything done. One man said he specifically doesn't want ARCO on his property.

Several interviewees said they wanted to be notified of all site activities before they begin, and more importantly, to have a voice in how those activities are conducted. Others suggested MDHES must consider the local planning process, historic uses and community concerns or there will be a major fight.

#### *7) How the site will be remediated*

One of the questions asked during interviews was how the interviewee thought the site should be cleaned up. Although this question isn't suggested in guidance, MDHES thought it particularly pertinent in light of upcoming cleanup decisions. One person pointed out that Superfund was not designed to deal with anything as big as Silver Bow Creek. Another said MDHES should keep in mind that it's tough for people in the area to accept it when we say we hope our solution will work.

Many interviewees expressed concern about the effects cleanup of Streamside Tailings will have on the Clark Fork River. "Superfund is the one chance citizens have to effect changes" so partial cleanup will be sacrificing parts of the Clark Fork River, a person said. Most people said they assume a combination of alternatives would be best. One person said he fears removal of tailings won't be considered as an alternative because it is perceived as too expensive. He said he would like to see re-mining of tailings (several other interviewees seconded this idea).

A number of concerns about cleanup were voiced:

- Lime treatment methods

One person said she is concerned that an old treatment method, lime addition, is being called "innovative" and that liming may create a hazard. This is inappropriate and it doesn't qualify for Superfund standards of innovative.

Another interviewee said liming and revegetating with topsoil might work to reduce human and animal exposure and possibly reduce water quality degradation, but we will still have to monitor this system and that takes societal commitment.





He said metals recovery needs to be the final goal, otherwise someone will have to guard the tailings forever.

Furthermore, several people were concerned about "fixation" of metals in lime treatment and wondered how long they will remain fixed. One woman said she can't find any supporting evidence to show how long the metals will remain fixed.

- Mobilization of arsenic in lime

One interviewee believes arsenic 5 is the most toxic form of arsenic. It moves in groundwater and has been found at Milltown. "Staggering" amounts of lime in the Clark Fork headwaters will send the arsenic 5 to Milltown and Noxon. This issue needs more study. There is a delicate balance needed to immobilize metals while not mobilizing arsenic, she said.

- Even mixing of lime in revegetated areas

There are "car door"-sized and larger chunks of tailings which have been left untreated by lime at the demonstration project areas. But even with a flour sifter, could the lime still hold the arsenic and the metals, the interviewee wondered.

- Possible uptake of metals by plants, animals and humans

Leaving tailings in place might curtail raising of certain crops in reclaimed areas. Also, where do the metals ultimately end up?

- Types of grasses and plants being used in revegetation demonstration projects

Two people said they are concerned that some of the plants being evaluated in the demonstration projects during the study phase may be considered weeds. They wanted to know of what value are these plants. Another concern was possible use of non-native species.

- Cumulative effects of various activities on Silver Bow Creek and Clark Fork River water quality

Leaving partially and totally unremediated areas along Silver Bow Creek may mean that we can't reach Gold Book standards. Decisions about the many things which affect Silver Bow Creek are being made separately. What will be the cumulative effect?

- Effects of leaving some tailings in place

If tailings are interspersed with vegetation, etc., then get out whatever you can, several people said. Cleanup should go beyond the visual tailings to buried tailings even though this may be problematic. Leaving tailings in the floodplain may usurp the public's right to their land uses and result in citizen lawsuits, a Butte resident said. Contamination of groundwater if tailings aren't removed was another concern.

Treating the tailings in place is okay for some places but not for Streamside Tailings, an interviewee said. She added that a healthy creek depends on a healthy floodplain. She wants to get to a point where the Warm Springs Ponds aren't needed to catch tailings coming down the creek.

An interviewee in Butte described in-place treatment of the tailings as management, not cleanup, and metals will eventually go into the creek. The governor's demonstration project isn't a long-term solution for the site, she said,



because follow-up monitoring hasn't been conducted on this project. There is no understanding of the basic geochemistry of the area, she added.

A Butte man said revegetation in Butte hasn't been successful and areas ARCO "fixed" are now eroding. He is concerned this will happen at Streamside Tailings.

Another interviewee suggested not moving the tailings. He said MDHES shouldn't move the waste if they can make it safe in-place.

- Ownership of land by ARCO

One interviewee said she thinks ARCO is buying a lot of land along Silver Bow Creek and is concerned the ultimate cleanup won't be as good. (MDHES has no information that ARCO is buying land along Silver Bow Creek.)

- Criteria for evaluating the effectiveness of revegetation are missing

There is nothing to weigh revegetation against, one person said. She expressed concern about the lack of historic information to help MDHES evaluate the revegetation.

- Disposal of removed tailings

Most interviewees were concerned about the final resting place of removed tailings. They said they want them in a safe repository out of the floodplain and protective of groundwater. No one who mentioned repositories wanted the tailings to go to the Opportunity Ponds. Several people interviewed were adamant they want the waste out of the floodplain. Several people said they think it is unfair to take the Colorado Tailings to Opportunity Ponds and that tailings disposal shouldn't cross county lines. One interviewee said he thinks that because the tailings came from Butte, that's where the repository should be located. One family suggested the tailings be put in nearby bentonite mines which are reportedly 400 feet deep. They said the bentonite would act as a natural liner and keep metals out of groundwater.

- Total removal of tailings

While some people suggested total removal of tailings as the only method to ensure long-term quality of Silver Bow Creek, one person was concerned total removal may be awfully harsh on fish populations and other wildlife. She wondered if total removal will really make the site any better.

- Metals recovery

Mineral recovery with a portable plant was suggested by a Ramsay man. He suggested this would basically mean mining the tailings in place and reclaiming them. He said some assays show copper levels at Ramsay Flats to be as high as the Berkeley Pit.

- Riprap and channelization of Silver Bow Creek

A Deer Lodge resident said he doesn't think Silver Bow Creek will ever be a trout stream. He said MDHES should riprap and stabilize the channel, and although it won't look natural, it will be stable and won't pick up metals from surrounding streambanks. Then MDHES should lime and seed the banks beyond the riprap.

Another person strongly disagreed with the channelization idea and said cement lining for the creek isn't a palatable solution. One family said they don't



want to see Silver Bow Creek put in a pipe.

- Cleanup will set a precedent

Whatever happens at Streamside Tailings will be done downstream on the Clark Fork River in terms of cleanup work, several people in Butte and Missoula said. It will set the precedent. MDHES must choose permanent cleanup methods for Streamside Tailings so that downstream remedies are likewise permanent.

- Cleanup of Ramsay Flats

One interviewee said the Flats should be remediated using a deep plow and berming of the creek. He doesn't believe in moving the problem somewhere else, he said. He suggested ARCO make an agreement with the property owner to limit grazing because overgrazing would be the worst problem.

- Order of cleanup

Several people were concerned in what order the sites in the area will be remediated. They suggested MDHES start as far upstream as possible.

#### 8) *Permanence of the remedy(s)*

As a criteria, permanence isn't weighted heavily enough. Thirty years doesn't mean "in perpetuity," an interviewee said. She said she is concerned permanence has been usurped by institutional controls and perpetual operation and maintenance. Institutional controls should be considered a cleanup method only if there is no other alternative. Unproven in-place remedies should not be considered permanent.

Concern was voiced that money spent on research of unproven technologies may have been better spent on removal of tailings. MDHES should compare the long-term costs of removal versus research and in-place treatment. Costs should include ARCO's public relations efforts to get the public to buy into remedies such as wetlands. Also included in the costs should be grant money, advertising and so on, by ARCO. Another cost which should be weighed is the cost of a tailings repository versus long-term maintenance of tailings in the floodplain.

#### 9) *Future potential liability*

What will happen to a property owner when tailings along his section of the creek are released and end up in someone else's field, one person asked. Will that person be liable? She said there is a large potential for lawsuits. She also wondered if local governments may be held liable by the citizens for complicity if they go along with non-permanent cleanup. An area rancher said he wants to make sure he isn't going to become a potentially responsible party because there is contamination on his property.

#### 10) *Historic preservation*

An interviewee in Butte said historic preservation is important but it should never be allowed to determine the remedy. She said historic designation should not



be made at contaminated areas. Toxicity and the environment should always be the number one concern, she said.

#### ***11) Sampling results***

A woman who owns land along Silver Bow Creek said she often she doesn't get results back from samples taken on her property. She wants all information about her property put together in one source. When she does get the results, it's usually six months later than promised. She said she has no complaints about the collection of samples on her property; the workers have always been careful. She said it's to her advantage to know more about her property. This same concern was voiced by several property owners on the site.

#### ***12) Effects on agriculture***

The safety of irrigation water to crops and cows was mentioned. A rancher pointed out there have been few studies on the effects on livestock but that cadmium is first metal picked up by the plant. Another rancher was concerned about the potential health effects of lime on cattle -- too little is known about this, he said.

Irrigation was another concern. One man said there has still been no determination where Silver Bow Creek ends and the Clark Fork begins. This is important to people who hold water rights he said. Another rancher said he is worried cleanup will take place while he is irrigating his property and that contamination released into the creek will wash into irrigation ditches and then onto crops. How far out on the banks from Silver Bow Creek would we have to go in cleanup, he also wondered.

One rancher said his family uses Silver Bow Creek water for some irrigation and copper is a big concern of his.

#### ***13) Future use of Silver Bow Creek after cleanup***

Interviewees' opinions vary on site use after cleanup, but all agree it should become a positive resource. A Ramsay resident said no land should be non-productive and/or fenced off from human access; if it's fenced off, it's not part of Montana. A Butte interviewee said limed and reseeded (reclaimed) land is of no use to the city.

Several people pointed out that Silver Bow Creek has been in poor condition so long that it is nearly impossible to imagine it being swimmable and fishable. One woman said the people of Butte should insist the Creek is called Silver Bow Creek not the Metro Storm Drain as it runs through Butte. A man in Missoula said he thinks about the site *not* in terms of Superfund and wants to see it returned to pre-mining metals concentrations. He said MDHES should start with this goal.

Silver Bow Creek could be a beautiful trout stream, a number of people said. Most interviewees said they would like it to be available for recreational use such as fishing, hiking, bike riding and picnics. Several people wanted to see improved habitat for wildlife. A Rocker resident suggested a wetlands be installed above the community. Ranchers were concerned creek water be available and clean enough for irrigation. They suggested installing dams upstream on tributary creeks not only to





control flooding and run-off but to make water available for irrigation all summer. Several people said they want to see creek flows come back to original level. The best solution will make the land useful, productive and safe, a Ramsay man said, and added it should be safe enough that kids can play there. Wildlife habitat is considered a "productive" use, he said.

An interviewee said he doesn't think MDHES or the communities can sustain institutional controls for more than a generation. One person said future citizens shouldn't have to deal with institutional controls. Additionally, institutional controls limit land use. All options for use must be available for the site after cleanup, a Missoula man said. Otherwise someone would have to compensate land owners to get them to comply with regulations on their property such as grazing restrictions. If MDHES chooses institutional controls as part of the remedy, it should be prepared to enter into legal agreements and maintain fences, he added.

An Opportunity resident said the community very much wants a buffer zone between Opportunity Ponds and their town. She explained they want life to be as normal as possible in that area. They are afraid the area will be so cut up, it will be unusable.

#### **14) *Miscellaneous concerns***

Interviewees voiced other important concerns:

- It seems that no matter how much investigation and cleanup are conducted, the site just gets worse.
- It's tough for MDHES to keep good personnel because of pay and working conditions.
- Concern about the truthfulness of ARCO study results.



## HIGHLIGHTS OF THE PROGRAM

### *Objectives*

MDHES objectives for community involvement at the site include but are not limited to:

- 1) *Work to increase meaningful citizen involvement in the process.* Some people feel powerless to affect the process. MDHES should empower the public, be up-front and proactive, and answer questions in a straightforward manner. MDHES will strive to be aware of and respond to public sentiment throughout the Superfund process at the Streamside Tailings portion of the site. While not all concerns can be addressed or remedied, MDHES will remain sensitive to all issues and will endeavor to respond accordingly.
- 2) *Be aware of the changing information needs of the public and be flexible in responding to those changes.* MDHES will be willing to find new ways to work with the public. One way to accomplish this is to make sure local governmental officials and the media are kept up-to-date and are encouraged to be actively involved in Superfund activities at the Streamside Tailings.
- 3) *Be available to the public and respond quickly to their questions and concerns.* MDHES should show it is being responsive to public input. Government is a public service industry -- MDHES should show how it is accomplishing that.
- 4) *MDHES should encourage everyone in the area to feel they are part of the solution.* Show people how they are affecting Silver Bow Creek. People who live on the creek are in tune with it. Land management overall is needed to protect public and the environment. Additionally MDHES should keep the lines of communication open between MDHES, EPA, Fish, Wildlife and Parks and the U.S. Fish and Wildlife Service, and any other involved agencies.
- 5) *Let people know what issues MDHES is taking into consideration and explain how we arrived at our decision.* The Record of Decision with its attendant responsiveness summary should be written in clear, concise language and should be directed toward the public.
- 6) *Superfund documents and issues tend to be too technical.* MDHES will work to make them easier for the public to understand. The vast majority of the interviewees complained about the technical language used by MDHES and EPA staff in speaking and writing. They strongly urged the agencies to work harder to translate the information.



## TECHNIQUES AND TIMING

Techniques for involving the public in site issues and decisions will vary widely to accommodate as many members of the public as possible. When asked how they get their information about Superfund, the answers ranged across the board from television to radio to newspapers to newsletters to word of mouth to the site owner to the agencies involved. One comment came up again and again: simplify and translate. Everything we communicate to the public should be in language they understand.

MDHES will conduct the following community involvement activities at the site:

### *1) Public meetings*

The purpose of public meetings is twofold: to give information to the public and to gain public input about site activities.

#### General approach:

The meeting format will be tailored to encourage audience participation such as breaking into small discussion groups. Speakers will be encouraged to explain events and findings in layman's terms and to use visual aids.

MDHES encourages local citizens to participate in the meetings, suggest who will speak, and when the meetings will be held. Meetings will be held in central locations, preferably during evening hours, on dates convenient for the public, i.e., not during other large public events, on weekends or holidays. When appropriate, MDHES may make arrangements for the meeting speaker to meet in a less formal setting with community members before or after the meeting. Speakers may include but will not be limited to MDHES and EPA site project staff and administrators, community members, Agency for Toxic Substances and Disease Registry staff and potentially responsible parties.

An interviewee who has experience organizing public meetings suggested having a "word warden" to point out when the speaker has used a jargonistic or technical word or when the conversation is getting too technical. MDHES should be careful not to give the impression that we don't want the audience to talk. Brainstorming works well at public meetings. Several people suggested breaking into small groups during the meeting, having the groups talk and then getting back into the big group and having the small groups report on their discussions. MDHES was reminded to return phone calls after meetings if someone asked a question we were unable to answer. An interviewee said MDHES should make sure it has something new to say. Other suggestions about public meetings included:

- Try to get away from the perception that it's just another government meeting and show the public how their input is important.
- Make the meetings more informal.
- Ask the people attending what they want. Try to get everyone in the room to say something.
- Have several meetings at different times on different days to appeal to and draw in a wider, larger audience.
- Explain how the agencies arrive at decisions.



- Focus on what the public cares about most: everyone come to public meetings for a reason. They aren't there to hear a technical discussion but rather to understand the issues and the process. Keep focused on the most important message we want to communicate. Stop and think about the meaning of the words we are using.

- People don't see how bad the site looks until they see it cleaned up. The demonstration project in Rocker is a good example. People think it looks great now but didn't realize how bad it was until it was worked on. She suggested we show before and after pictures at public meetings of both demonstration projects.

- A workshop about the basin would help. Avoid the jargon and get down to the most basic issues and language.

- Show photos; skip the graphs and charts. Maps are most effective if they have a lot of color.

- Small group meetings are better for area ranchers. The Ramsay school is a good location. Make it informal.

- Written comments are important. Hand out forms at public meeting for people to write their comments.

#### Timing:

Public meetings will be held during public comment periods on the risk assessment, remedial investigation, and feasibility study/proposed plan. MDHES will also hold public meetings when the Record of Decision is released. MDHES will consider other public meetings as appropriate or as requested by the public.

#### Publicity:

MDHES publicizes meetings by placing ads and press releases in local newspapers and on local radio stations. Other publicity often includes small flyers posted in public areas, post cards sent to the site mailing list, and meeting information printed in the MDHES site progress reports.

#### Meeting locations:

The meetings should be held, if possible, throughout the site in locations such as Rocker, Ramsay, Opportunity and even in Missoula. Each community has a public meeting hall or school available for meetings. The best meeting time is 7 p.m. and the best days of the week are Wednesday or Thursday.

## **2) Document repositories**

Site documents and other information will continue to be made available to the public near the site. MDHES has established repositories of site documents for check-out at the Butte Public Library, the Montana Tech Library in Butte, the Montana State University Renne Library, EPA's Butte office, the Grant Kohrs Ranch office in Deer Lodge, the Hearst Free Library in Anaconda, the Missoula Public Library, and the University of Montana Library in Missoula, the State Library and MDHES offices in Helena. In addition, the Clark Fork-Pend Orielle Coalition offices in Missoula and Butte house documents. MDHES sends documents to the repositories as quickly as possible after publication.





**3) *Continue to work with citizen and environmental groups***

In 1992, the Citizens Technical Environmental Committee (CTEC) was awarded an EPA technical assistance grant for the Silver Bow Creek site. MDHES attends and participates in monthly CTEC meetings and stays in phone contact between meetings. MDHES will continue to keep the group informed about current site investigations and the screening of potential cleanup methods and will continue to receive input about these issues. MDHES will attend citizen group meetings, when invited, to answer questions about the site or make presentations.

The Concerned Citizens of Opportunity is an informal but organized group of residents who are concerned with Superfund issues. Meeting turnouts average 30 to 50 people. MDHES will meet with this group as requested.

Several environmental groups have also been involved in site issues. These groups include the Clark Fork-Pend Oreille Coalition, Trout Unlimited, the Montana Environmental Information Center and others. MDHES will continue to keep these groups involved in the process and will meet with them as requested.

**4) *Press releases***

Press releases are used for information such as meeting announcements, new data and site projects. Press releases are prepared by the MDHES Superfund public information officer and reviewed by the project manager and departmental management for approval prior to release. Press releases are written in Associated Press style, inverted pyramid fashion (most important information first) and double-spaced. When applicable, at the end of the release, a note is added requesting that meeting information be included also in the community calendar. Each press release will contain the names and phone numbers of MDHES personnel to contact for further information.

**5) *Public service announcements***

Public service announcements (PSAs) may accompany press releases which are sent to radio and television stations. PSAs are used for meeting notices, workshops, the toll-free Superfund phone hotline (1-800-246-8198), etc.

**6) *Press contact list***

MDHES maintains and regularly updates a press contact list for the site. The list includes all press contacts in the Clark Fork Basin area. (Please refer to list at the end of this document.)

**7) *Progress reports***

MDHES publishes progress reports in which information is broken down into short, readable sections or "articles." The progress reports contain information on recently released documents, upcoming meetings, site activities, completion of projects, sampling results, etc. Progress reports should contain easy-to-read maps to help explain site activities.



Progress reports are sent to those people on the site mailing list. Extra copies are distributed for pamphlet racks in Butte, Anaconda, Deer Lodge, Missoula at a number of public agencies and other locations deemed appropriate. MDHES keeps extra copies of progress reports on file to distribute at public meetings and to provide site background information.

Progress reports will include but not be limited to: overviews of the remedial investigation, risk assessment, Streamside Tailings and Revegetation Study, feasibility study and screening of cleanup alternatives.

Interviewees made the following suggestions which MDHES will incorporate:

- Progress reports should be shorter and more graphic. Use less text.
- Try using question-and-answer format including the most-asked questions.
- Do reports more often to keep the site at the front of people's minds.
- Send multiple copies of progress reports to the Ramsay post office because everyone there has a post office box.

#### *8) Access to private property for sampling activities*

When MDHES needs to take samples or conduct remediation activities on private property, we will coordinate access with the property owner in advance. When possible, the public information officer or site project manager will contact the residents and/or owners in person, explain what will happen, and ask the property owner to sign a permission form. For Streamside Tailings, ARCO has been conducting access work according to the Administrative Order on Consent. A sample access agreement is included in the order.

The information officer or project manager will make every effort to ensure that workers arrive at convenient times for the owner. The information officer or project manager will then provide copies of the permission forms, resident contact sheets, any necessary maps, and special instructions or requests to the personnel doing the sampling. Depending on the complexity of the activities and the knowledge of the residents, MDHES may provide the residents with fact sheets. Residents will be given results in easy-to-understand language in addition to the technical data.

#### *9) Continue to remind the public of the toll-free hotline*

The MDHES Superfund in-state toll-free number, or "hotline," was established in June 1987 and has proven an effective tool for the public as well as MDHES. The public may be hesitant to call government offices when they have to pay long-distance charges. The hotline eliminates this hesitancy. The hotline is in operation during business hours at MDHES and an answering machine takes messages in the evenings and on weekends. The number is 1-800-246-8198.

#### *10) Make the site file available to the public*

The public may wish to look at open file information. This information will be made available at the MDHES Helena Office. The file contains documents upon which the site remedy selection is based. MDHES site records are open to the public.



Requests to review them are directed to the Superfund docket clerk and/or the site project officer.

#### *11) Maintain and update the mailing list*

At MDHES, the site mailing list is kept on computer files and is updated regularly. MDHES actively solicits additions to the mailing list in the progress reports and at public meetings. Maintenance and updating is coordinated by the MDHES Superfund public information officer. In accordance with Montana State Law, the mailing list is confidential and cannot be released by MDHES.

#### *12) Media relations and education*

Because most members of the public get the majority of their information from news sources including television, radio and newspapers, MDHES will continue media relations at the site. Several interviewees suggested MDHES try to do more outreach with television. They pointed out that ARCO has been buying a lot of ad time and that MDHES should do the same. Another interviewee said radio tends to be underused and encouraged MDHES to explore that medium more. A Butte resident said MDHES should make better use of the weekly newspapers by sending them articles already written and ready for printing. She also suggested adding the Montana Tech student newspaper, the Technocrat, to the media mailing list.

#### General approach:

MDHES sends out press releases to announce public meetings and other activities. Press releases are used also to inform the public about milestones at the site. MDHES will spend time in the coming year getting the press up-to-speed about site issues so they are ready to cover the proposed plan and related stories.

#### Specific activities:

##### One-on-one meetings with the media:

A number of new people are working in the media at the site. In early 1994, MDHES met individually with reporters, editors and news directors in the Clark Fork Basin to learn how they can best keep them abreast of site events. These one-on-one meetings will continue at regular intervals throughout the Superfund process.

Meetings with the press are especially helpful when MDHES has complex or extensive information they would like to convey to the community. These meetings usually are held in the daytime before evening public meetings. In these press meetings, the information officer or project manager can give the reporters a brief rundown of what will be presented at the public meeting.

##### Site tours:

Members of the media said they would like more site tours. One news organization interviewed said if MDHES conducts a tour it is more legitimate than an ARCO tour. Mornings are best. Friday is not good.



**13) One-on-one contact with the public**

Although public meetings are effective, they can be impersonal. One-on-one contact will continue to be a vital component of MDHES's community involvement work. For instance, MDHES will continue to be involved in arranging meetings with city/county leaders, public interest groups, Congressional aides, state legislators, and so on. The Superfund public information officer will also communicate one-on-one with members of the community. Community groups such as Optimist, Kiwanis, Chamber of Commerce, League of Women Voters, Rotary, etc., are encouraged to contact the public information officer to arrange speakers for their group meetings. MDHES has been encouraged by interviewees to hold more small group meetings with city and county officials. Another activity which falls into this category is education within the local school system. An interviewee in Butte pointed out that adults in the community are making decisions for future generations without input from young people.

**14) Maintain central public information contacts**

The site project manager and the public information officer are the first-line contact people for the public in most cases. When these staff members are unavailable, calls and visits will be directed to the Superfund program supervisor.

**15) Site tours**

Public site tours are a good method to help the public and the media learn more about site problems. Public site tours should be held on weekends. Butte members of the press said they would like more site tours by MDHES. For press tours, morning is best Monday through Thursday. Friday is not a good day for site tours.

**16) Meetings with local officials**

During the interviews, the Anaconda-Deer Lodge Chief Executive requested that MDHES hold quarterly meetings with her and the Butte-Silver Bow Chief Executive. MDHES will set a meeting time and place which is convenient to local officials and will update them about site activities, etc. Others who may be interested in attending these meetings are county health officials, sanitarians and planners. Work sessions of the City/County in Anaconda are every second and fourth Wednesday of the month at 7:30 p.m. MDHES can get on the agenda by contacting Carol Guiluly.

**17) Sack lunch forums**

Some of the interviewees suggested noontime as a good opportunity to reach the local business people. Sack lunch forums could be held at any of the following locations: Opportunity Community Hall, Ramsay School during the summer months, or the Rocker Community Hall.





**18) *Speak to local community groups***

Local community groups need speakers on a weekly basis. MDHES will send a notice to these groups letting them know the agency has speakers available to present Streamside Tailings to them.

**19) *Set up a citizens roundtable***

MDHES has begun organizing a citizens roundtable. Although there is currently a citizens advisory group, CTEC, based in Butte, the group has members representing predominantly the upper end of the site. Furthermore, CTEC must divide its time among a large number of operable units at the site. MDHES will continue to work closely with CTEC and rely on their advice. Additionally, MDHES will continue to work with all area groups and communities. However, MDHES thinks it is extremely important that affected communities hear each other's concerns and needs as they relate to site issues. The roundtable's main purpose will be to advise MDHES about the remedy chosen for Streamside Tailings. Because the site directly or potentially affects so many communities, MDHES wants the roundtable to represent all those communities and as many individual interests as possible.

MDHES will solicit membership by sending a notice to everyone on its mailing list about an organizational meeting to take place in fall 1994. It will ask individual community governments and organizations to each choose a representative to be on the group. MDHES will also encourage "at large" members who don't represent any local government or community groups. The group will meet monthly or more often to discuss site status and issues related to remedy selection. It is MDHES's intention that these meetings at first be a presentation of the issues by MDHES but then quickly change to a forum for productive discussion of the issues. After each meeting, MDHES will issue a meeting summary which will be mailed not only to the advisory group membership, but also to the entire site mailing list. After the record of decision is written the group may decide to disband.

MDHES will encourage the group to be as autonomous as possible. However, MDHES will provide logistical support such as fact sheet publication, meeting arrangements and notification, advertising, etc. All meetings will be open to the public and can be held in locations requested by the group. Please refer to Attachment D for a partial list of potential participants.

**20) *Hold public comment periods on site documents***

MDHES will hold minimum 30-day public comment periods on the following documents which will be released separately:

- Draft risk assessment
- Draft remedial investigation
- Draft feasibility study/proposed plan

MDHES will announce the comment periods via press release and legal ads as well as in progress reports summarizing these documents. MDHES will respond to comments in the responsiveness summary which will be part of the Record of Decision.



**21) *Make use of community phone trees***

Two of the site communities have phone trees organized. MDHES was encouraged to utilize these. MDHES will call the primary contact and she will, in turn, contact two more people who will contact two more people and so on.

- Concerned Citizens of Opportunity
- Peggy Flannick in Rocker

**22) *Superfund displays***

Displays with pictures and information in public places are effective. The display should also include who to contact with MDHES for more information. Displays could be set up at any or all of the following locations or could be a "traveling" show: Senator Baucus' offices in Missoula and Butte, public libraries, U of M Mansfield Library, county offices, and other public locations.

**23) *Videos of the site***

Several interviewees suggested video as a way to reach people in their homes. Depending on available funds and resources, video tapes of the site could be produced and distributed to local schools for check-out to students. Videos could be aired on Community Access Television and local stations.



ATTACHMENT A

CONTACT LIST

Montana Department of Health and Environmental Sciences

- Director's office
- Superfund supervisor Neil Marsh
- Site project manager Jim Ford
- Public information officer Jane Heath

Cogswell Building, P.O. Box 200901  
Helena, Montana 59620-0901  
406-444-1420 or 1-800-246-8198

EPA, Helena Office

- Director John Wardell
- Superfund branch chief Bob Fox, ext. 244
- Remedial project manager Mike Bishop, ext. 248
- Community involvement coordinator Pam Hillery, ext 246

U.S. EPA  
Federal Building, Drawer 10096  
301 South Park  
Helena, MT 59626  
406-449-5720

Butte/Silver Bow Local Government Officials

Chief Executive Jack Lynch  
155 West Granite  
Butte, MT 59701 723-8262

Planning Director Jon Sesso  
155 West Granite  
Butte, MT 59701 723-8262

Health Department Director Dan Dennehy  
25 West Front St.  
Butte, MT 59701 723-3275



Anaconda/Deer Lodge Government Officials

Chief Executive Cheryl Beatty  
800 South Main  
Anaconda, MT 59711 563-8421 ext. 201

Planning Director Milo Manning  
800 South Main  
Anaconda, MT 59711 563-8421

News Media

Print:

Associated Press - Helena  
Montana Standard, Butte  
Silver State Post, Deer Lodge  
Missoula Independent, Missoula  
Missoulain, Missoula  
Plainsman, Plains  
Mineral Independent, Superior  
Sanders County Ledger, Thompson Falls  
Waste Tech News, Denver  
Enrironmental Hotline, Albequerque

Broadcast:

Associated Press - Helena  
KQUY/KXTL Radio, Butte  
KBOW/KOPR Radio, Butte  
KYSS/KLCY Radio, Missoula  
KGRZ/KDXT Radio, Missoula  
KUFM Radio, Missoula  
KXLF TV, Butte  
KCTZ TV, Bozeman  
KPAX TV, Missoula  
KECI TV, Missoula





ATTACHMENT B

INFORMATION REPOSITORIES

Montana Tech Library  
West Park Street  
Butte, MT 59701

Butte Public Library  
226 West Broadway  
Butte, MT 59701

Montana State Library  
Capitol Complex  
Helena, MT 59620

Superfund Office  
Montana Department of Health and Environmental Sciences  
2209 Phoenix Ave.  
Helena, MT 59620  
(406)444-1420 or 1-800-246-8198

CTEC Office  
Montana Tech Campus  
Butte, MT 59701

Clark Fork-Pend Orielle Coalition Office  
Missoula, MT 59801

U.S. EPA Office  
301 South Park  
Federal Building  
Helena, MT 59601

Hearst Free Library  
401 North Main  
Anaconda, MT 59711

Grant-Kohrs Ranch  
National Park Service  
P.O. Box 790  
Deer Lodge, MT 59722

Missoula County Library  
301 East Main  
Missoula, MT 59807



**PUBLIC MEETING LOCATIONS**

Boulevard Fire Hall  
Bill Fisher, Sr. (fee: \$50)  
Corner of LaSalle and Franklin  
Butte, MT 59701  
723-4290

Butte/Silver Bow Health Department Conference Room  
Dan Powers  
25 West Front Street  
Butte, MT 59701  
723-3275

Opportunity Community Hall  
Connie Daniels  
563-8421

Ramsay School  
Principal Rose Garvey  
Ramsay, Montana  
782-5470

Fairmont Hot Springs Resort  
Jenni Micheletti  
Director of Catering  
800-332-3272

St. Patrick Hospital  
Missoula, Montana  
543-7271



**ATTACHMENT C  
QUESTIONS ASKED DURING  
COMMUNITY INTERVIEWS**

1. What is your understanding of the site history?
2. What is the local level of environmental concern? Economic concern?
3. What are some of the major issues of public concern other than Superfund?
4. How have you been involved in site activities? Do you want to continue to be involved? How?
5. What are your concerns about the site?
6. How do you feel about MDHES? EPA? ARCO?
7. Does the public understand the severity of the wastes at the site?
8. What are the best ways for MDHES to communicate with and involve the public in the site?
9. Are there other people you suggest I interview to get a broad base of opinions and interests?
10. Would you like to be (or continue to be) on our site mailing list?
11. How should the site be cleaned up?



**ATTACHMENT D  
ROUNDTABLE CONTACT LIST**

The following list represents, in addition to the general public, the organizations and local governments whose participation MDHES will most directly solicit:

**Superfund citizen groups:**

- Anaconda Deer Lodge Reclamation Advocates
- Citizens Technical Environmental Committee
- Milltown Technical Advisory Committee
- Concerned Citizens of Opportunity

**Environmental groups:**

- Clark Fork Pend Orielle Coalition
- Montana Environmental Information Center
- Audubon
- Upper Clark Fork Steering Committee
- Ducks Unlimited
- Trout Unlimited
- Montana Wildlife Federation
- Anaconda Sportsmen's Club
- Skyline Sportsmen's Club

**Local governments:**

- Butte-Silver Bow
- Anaconda-Deer Lodge
- Granite County
- Deer Lodge City
- Powell County
- Drummond
- Missoula City
- Missoula County
- Mineral County
- Local school boards

**State and Federal Government:**

- Montana Department of Fish, Wildlife and Parks
- Agency for Toxic Substances and Disease Registry
- U.S. Fish and Wildlife Service
- U.S. Soil Conservation Service
- Headwaters Resource Conservation and Development District
- Montana Natural Resource Damage Assessment Program
- Montana Dept. of Natural Resources and Conservation Water Rights Bureau





**Misc.**

Milltown Water Users Association

Ranchers and irrigators along Silver Bow Creek and Clark Fork River]

Rocker Water District

All news media



APR 1999

